

EXHIBIT A

1 activity and you believe that based on that speech you
2 were retaliated against. That claim has since been
3 dismissed and you are now claiming it appears to be a
4 political association claim.

5 Can you tell me what facts you have that
6 support what type of conduct you entered into with
7 respect to the political association?

8 A. Well, I hope this answers your question.
9 Colonel McAllister and I were and still are very good
10 friends. There's a clear rift between he and the
11 current administration.

12 I also would consider myself to be
13 friendly with Tom Gordon and other members of his
14 previous administration.

15 Q. Such as?

16 A. Wayne Merritt, Joe Bryant, Stu Snyder. People
17 who have a working relationship with but not
18 necessarily a close personal relationship are those
19 persons who I just mentioned besides Dave McAllister.

20 Q. So Dave McAllister is the only one you have a
21 personal friendship with outside of work?

22 A. Yes, although I'm still -- I'm not personally a
23 close friend of Tom Gordon's now because of the
24 indictment so I'm prohibited from speaking with him,



1 Q. Do you recall whether or not you voted in the
2 2004 general election for County Executive?

3 A. I did.

4 Q. Who did you vote for?

5 A. I voted for the Democratic candidate, Chris
6 Coons.

7 Q. Did you make any financial contributions to
8 either Sherry Freebery -- well, I'll ask you
9 separately.

10 Did you make any financial contributions
11 to Sherry Freebery?

12 A. I did not.

13 Q. Did you make any financial contributions to
14 Chris Coons' campaign?

15 A. I did not.

16 Q. What about the Republican candidate who was...

17 A. Castagno maybe.

18 Q. That sounds about right, yes.

19 Did you make any contributions to
20 Castagno?

21 A. I did not.

22 Q. Did you go to any fundraisers for Sherry
23 Freebery for County Executive?

24 A. I do not believe so.



1 others. I just don't recall.

2 Q. So there's no way for someone in the public to
3 find a list of who's on this McAllister team?

4 A. There's no list that exists, so I don't know if
5 the public would find such a list if it doesn't exist.

6 Q. Did the people that you have listed as well as
7 any other people that you might think of later on, did
8 you meet collectively as a group?

9 A. Sometimes socially but not necessarily a group
10 type meeting/setting, if that makes sense. Sorry.

11 Q. When you may have met socially, was it
12 considered a meeting of the McAllister team?

13 A. No.

14 Q. Did you pay any dues to this McAllister team or
15 fees?

16 A. I did not.

17 Q. Did anybody else that you know of?

18 A. No.

19 Q. Was there any type of policy or agenda that
20 this team decided it was going to put forward?

21 A. No.

22 Q. Were there any type of membership cards?

23 A. No, ma'am.

24 Q. Did the McAllister team make any endorsements,

